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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**1:23-cr-00254-MC**

**v.**

**SECOND BILL OF PARTICULARS  
FOR FORFEITURE OF PROPERTY**

**NEGASI ISHAIAH ZUBERI aka JUSTIN  
JOSHUA HYCHE,**

**Defendant.**

The United States of America hereby files the following Bill of Particulars for Forfeiture of Property.

The United States gives notice that in the forfeiture allegation of the Superseding Indictment, the United States is seeking forfeiture of the following property:

1. Three AR-15 magazines (5.56) containing ammunition;
2. One antenna device
3. One antenna device
4. 5.56 and 12 GA ammunition in plastic green ammunition box.
5. Nineteen rounds of assorted 9mm pistol ammunition
6. Double lock nickel plated steel handcuffs in box
7. Green metal ammunition can with Handcuff keys, lapel pin, 5.56 ammunition
8. Springfield XD 9mm Pistol Case
9. Steel ballistic plate vest carrier with three AR-15 Magazines (5.56)
10. Springfield Armory steel 9mm magazine
11. Barrel and upper receiver for 6mm AR Style Rifle

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12. Springfield XD M-9 9mm pistol
13. Shell casing "Hornaday 9mm Luger"
14. Apple laptop, S/N: RN7YY6022V
15. Bullet "RP 9mm Luger"
16. Handcuff Key
17. One AlumaTrans Metal Gun Case
18. AR-15 Magazine
19. Three 9mm handgun magazines
20. Various handgun holsters
21. 1 set silver, 1 set black hand cuffs
22. Black mesh bag, cell phone jammer, unknown antenna device, black gloves, black hat, and handcuffs
23. Two taser cartridges
24. Taser "Pulse," yellow and black in color
25. Twenty-seven rounds 5.56 Rifle ammunition (removed from magazine)
26. Two rounds 12 GA 2 3/4 in 00 Buckshot rounds (located in Stoeger)
27. Sixty-three rounds of 9mm Ammo
28. Remington Model 783 .308 Cal
29. Anderson Manufacturing AR-15
30. Stoeger Condor 12 GA Shotgun
31. Grey iPhone with cracks on back of phone
32. AR-15 lower jig instructions with handwritten notes
33. Lower receiver with attempted milled at trigger hole
34. Eight rounds of 9mm Blazer ammunition
35. Three boxes of 7.62 Wolf ammunition
36. Three MFT 5.56x45 magazines
37. Twenty-five round 6mm magazine
38. 7.62x39 magazine
39. Twenty-nine rounds 7.62x39 ammunition
40. Two 6mm round magazines
41. Thirty rounds Hornaday 6mm ammunition
42. AR-15 Rifle lower parts kit
43. Box of Remington 9mm ammunition
44. 50 tactical box containing lower receiver
45. New Frontier armory box containing trigger and miscellaneous items

Dated: October 8, 2024.

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

s/ Marco A. Boccato  
**MARCO A. BOCCATO**  
Assistant United States Attorney